

1 Sarah E. Piepmeier, Bar No. 227094
2 SPiepmeier@perkinscoie.com
3 Elise Edlin, Bar No. 293756
4 EEdlin@perkinscoie.com
5 PERKINS COIE LLP
6 505 Howard Street, Suite 1000
San Francisco, California 94105
Telephone: +1.415.344.7000
Facsimile: +1.415.344.7050

7 Janice L. Ta (appearance *pro hac vice*)
8 JTa@perkinscoie.com
9 PERKINS COIE LLP
405 Colorado Street, Suite 1700
Austin, Texas 78701
Telephone: +1.737.256.6100
Facsimile: +1.737.256.6300

11 *Attorneys for Defendant NETFLIX, INC.*

12
13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**
16

17 LAURI VALJAKKA,
18 Plaintiff,
19 v.
20 NETFLIX, INC.,
21 Defendant.

Case No. 4:22-cv-01490-JST

**PARTIES' JOINT STIPULATION AND
[PROPOSED] ORDER TO EXTEND
TIME FOR DEFENDANT TO RESPOND
TO PLAINTIFF'S SECOND AMENDED
COMPLAINT**

[CIVIL LOCAL RULE 6-2]

Judge: Hon. JON S. TIGAR

1 **TO THE HON. JON S. TIGAR, UNITED STATES DISTRICT JUDGE, NORTHERN**
2 **DISTRICT OF CALIFORNIA:**

3 Pursuant to Civil Local Rule 6-2 of the Civil Local Rules (L.R.), Defendant Netflix, Inc.
4 (“Defendant” or “Netflix”) and Lauri Valjakka (“Plaintiff” or “Valjakka”) stipulate as follows:

5 WHEREAS, on March 24, 2022, this case was assigned to Judge Jon S. Tigar in the
6 Oakland Division of the Northern District of California following Parties’ joint motion to transfer
7 from the Western District of Texas (Dkt. 25).

8 WHEREAS, on March 24, 2022, the Court set a Case Management Conference for June
9 28, 2022, with a Joint Case Management Conference Statement due on June 21, 2022 (Dkt. 26).

10 WHEREAS, on March 30, 2022, the Court reset the Case Management Conference to
11 April 19, 2022 (Dkt. 27).

12 WHEREAS, on April 4, 2022, Netflix filed an unopposed administrative motion to reset
13 the Case Management Conference to on or after May 3, 2022 (Dkt. 29).

14 WHEREAS, on April 12, 2022, this Court granted Netflix’s unopposed administrative
15 motion and reset the Case Management Conference to May 3, 2022 (Dkt. 32).

16 WHEREAS, Netflix’s deadline to respond to Valjakka’s First Amended Complaint was
17 set for May 16, 2022 (Dkt. 35, as granted Dkt. 38).

18 WHEREAS, Valjakka filed a Second Amended Complaint on May 12, 2022, which
19 mooted the May 16, 2022, deadline (Dkt. 39).

20 WHEREAS, Netflix’s deadline to respond to Valjakka’s Second Amended Complaint
21 pursuant to Fed. R. Civ. P. 15(a)(3) is May 26, 2022.

22 WHEREAS, on May 14, 2022, counsel for Parties met and conferred and agreed to submit
23 a stipulation for a fourteen (14) day extension for Netflix to file its response to Valjakka’s Second
24 Amended Complaint up to and including June 9, 2022.

25 WHEREAS, this stipulation will not alter the date of any event or any deadline already
26 fixed by the Court order.

1 NOW, THEREFORE, the Parties, by and through their respective counsel, hereby
2 stipulate and agree that Netflix's response to Valjakka's Second Amended Complaint shall be
3 filed no later than June 9, 2022.

4
5 Dated: May 18, 2022

Respectfully submitted,

6 PERKINS COIE, LLP

7 /s/ Sarah E. Piepmeier

8 Sarah E. Piepmeier, CA SBN 227094

9 ***Attorney for Defendant Netflix, Inc.***

10
11 Dated: May 18, 2022

MAHAMEDIP LAW LLP

12 /s/ Susan S.Q. Kalra

13 Susan S.Q. Kalra, CA SBN 167940

14 ***Attorney for Plaintiff Lauri Valjakka***

1 **PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.**

2
3
4 Dated: _____

By: _____
HON. JON S. TIGAR
UNITED STATES DISTRICT JUDGE

SIGNATURE ATTESTATION

I, Sarah E. Piepmeier, am the ECF user whose user id and password authorizes the filing of this documents. Under Civil L.R. 5-1(h)(3), I attest that counsel for Plaintiff has concurred in this filing.

Dated: May 18, 2022

/s/ Sarah E. Piepmeier
Sarah E. Piepmeier, CA SBN 227094

Attorney for Defendant Netflix, Inc.